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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 REAL PROPERTY LOCATED AT 15999
RIVER ROAD, GUERNEVILLE,
15 CALIFORNIA, SONOMA COUNTY, APN:
070-050-032-000, INCLUDING ALL
16 APPURTENANCES AND IMPROVEMENTS
THERETO, ET AL.,
17
18 Defendants.

2:24-CV-00889-TLN-JDP

STIPULATION TO STAY FURTHER
PROCEEDINGS AND ORDER

19 The United States and claimants Matthew Gillum and Shauna Barnard hereby stipulate that a
20 stay is necessary in the above-entitled action and request that the Court enter an order staying all
21 further proceedings until the resolution of the related criminal case, *United States v. Matthew Gillum*,
22 Case No. 2:25-CR-0053-TLN.

23 1. This is a forfeiture *in rem* action against riverfront property in Guerneville, California
24 (the “Guerneville Property”) and a promissory note secured by real property located at 2930 Locan
25 Avenue in Clovis, California (the “Promissory Note”) (collectively, the “defendant assets”) because
26 the defendant assets were allegedly purchased with drug proceeds that were illegally laundered in
27 violation of federal drug and money laundering laws. Matthew Gillum, as Trustee of the Gillum
28

1 Family Protection Trust, filed a claim asserting an ownership interest in the defendant Guerneville
2 Property. Shauna Barnard filed a claim asserting an ownership interest in the defendant Promissory
3 Note.

4 2. The parties jointly request the matter be stayed pursuant to 18 U.S.C. §§ 981(g)(1),
5 981(g)(2), and 21 U.S.C. § 881(i). The United States contends that the defendant assets represent
6 proceeds of drug sales in violation of 21 U.S.C. § 841, as well as property involved in money
7 laundering transactions in violation of 18 U.S.C. §§ 1956-57. Claimants deny these allegations.

8 3. To date in the companion criminal case, Matthew Gillum has been charged with federal
9 crimes related to a series of money laundering transactions involving the proceeds of illegal drugs,
10 *United States v. Matthew Gillum*, Case No. 2:25-CR-0053-TLN (the “related criminal case”). The
11 United States intends to depose the claimants (and others) regarding their ownership of the defendant
12 assets, as well as their knowledge and participation in Matthew Gillum’s alleged crimes involving the
13 defendant assets. If discovery proceeds at this time, claimants will be placed in the difficult position
14 of either invoking their Fifth Amendment rights against self-incrimination and losing the ability to
15 pursue their claims to the defendant assets or waiving their Fifth Amendment rights and submitting to
16 a deposition and potentially incriminating themselves. If they invoke their Fifth Amendment rights,
17 the United States will be deprived of the ability to explore the factual basis for the claims they filed
18 with this court.

19 4. In addition, claimants intend to depose, among others, the agents involved with this
20 investigation, including but not limited to, the agents with the Federal Bureau of Investigation (“FBI”).
21 Allowing depositions of the law enforcement officers at this time would adversely impact the federal
22 prosecution and ongoing investigation.

23 5. The parties recognize that proceeding with these actions has potential adverse effects
24 on the investigation of the underlying criminal conduct and/or upon the claimant’s ability to assert any
25 defenses to forfeiture. For these reasons, the parties jointly request that these matters be stayed until
26 the conclusion of the related criminal case. At that time, the parties will advise the court of the status
27 of the related criminal case, if any, and will advise the court whether a further stay is necessary.

28 6. If any of the defendant assets go into default, the parties reserve all rights, including the

1 right to seek all avenues of redress to preserve the value of the assets, including filing a motion for
2 interlocutory sale or seeking a receiver appointment—or modification of an existing appointment—to
3 collect rents and maintain the property.

4 Dated: 5/21/2025

MICHELE BECKWITH
Acting United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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8 Dated: 5/19/2025

/s/ David A. Blair
DAVID A. BLAIR
Attorney for claimant Matthew Gillum

9
10 Dated: 5/19/2025

/s/ Matthew B. Hodroff
MATTHEW B. HODROFF
Attorney for claimant Shauna Barnard

11
12 (Signatures authorized by email)

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15 **ORDER**

16 For the reasons set forth above, this matter is stayed pursuant to 18 U.S.C. §§ 981(g)(1),
17 981(g)(2) and 21 U.S.C. § 881(i) until the resolution of related criminal case, *United States v. Matthew*
18 *Gillum*, Case No. 2:25-CR-0053-TLN. The parties shall file a joint status report within thirty days of
19 the conclusion of the parallel criminal case, or as the Court deems appropriate.

20
21 IT IS SO ORDERED

22 Dated: May 22, 2025

23 
Troy L. Nunley
Chief United States District Judge